



DATE: April 20, 1979

TO: Division File

FROM: Ken Mensing - Southern Region

SUBJECT: St. Clair Co. - LPC 163 045 29 - East St. Louis/ACF Industries

EPA Region 5 Records Ctr.



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On April 18, 1979 while attending a regional managers meeting in Springfield, I was given a copy of a letter from the U. S. Department of Labor to the Regional Administrator of the U.S.E.P.A. in Chicago. The complaint letter was dated April 9, 1979. Also, on April 18, 1979 I met with Jack Moore in his office to discuss the letter. He said that it contained serious accusations and that we should investigate the situation tomorrow. I told him that we would and that I would report our findings immediately to Bill Child.

On April 19, 1979 at 9:45 a.m. Perry Mann and I arrived at the ACF Industries Plant at 100 Trendly Avenue, E. St. Louis. This plant repairs damaged rail cars. We met with Mr. H. L. Birlew, Plant Manager, Shippers Car Line Division, ACF Industries, Inc. I explained that we had received a complaint letter from the U.S.E.P.A. who had received a letter from O.S.H.A. stating that there may be problems in the handling and disposal of hazardous materials. I told him that we would like to inspect their facilities. A couple of telephone calls were made. I talked to Jon Meyer, ACF Manager of Administration in St. Charles, Missouri and explained our mission to him.

Mr. Birlew took us through their entire facility. The only problem encountered was a pit dug into the ground approximately 50 feet by 20 feet and of unknown depth. This pit was used to collect the rinse water and residues from cleaning out railroad cars delivered to them for repair. Mr. Birlew said the cars are received essentially empty, but that some contain a minor amount of commodity and residue that must be cleaned out. Active steam is utilized for the process. The contents of the pit appeared thick and black. This pit is only several hundred feet from the Mississippi River. Two pits are located adjacent to and west of the waste pit, but contained only rainwater. Mr. Birlew said that in the past they have pumped liquid from the active pit to another pit located on the North side of the plant. They have a skimming device at the active pit with which they periodically remove the scum on the pit into an old tank car next to the pit. Mr. Birlew said they have never emptied the tank car. The pit is protected by guard rails, fence and warning signs.

When I asked permission to photograph the pit and to collect samples, he said that I should wait until I was able to meet with Clifford Metcalf, Environmental Specialist with ACF at the facility in the near future. Mr. Metcalf was in Iowa. I agreed to his request.

I told Mr. Birlew that I considered the waste pit an alleged environmental hazard due to its proximity to the river and the marginal geology of the area.

KGM:jlr

cc: Southern Region
Bill Child
Tom Cavanagh
Rauf Piskin

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